

THE STATE OF TEXAS

Tarrant

COUNTY

KATHLEEN SHANNON AFFIDAVIT

Before me, Elizabeth Horton, a Notary Public in and for said County in said State, personally appeared Elizabeth Horton whose name is signed to this Affidavit and who is known to me, and who being by me first duly sworn deposes and says as follows:

1. That my name is Elizabeth Horton, and I reside in Montgomery County, Alabama, and I am over the age of 19 years.

2. I was employed for approximately two months through Kelly Services as a temporary employee assigned to work at a place of business operated by National Seating and Mobility, Inc., and because of that fact I was seeking permanent employment with other businesses that offered better opportunities.

3. Before and during my assignment to work at National Seating and Mobility, Inc., I understood that my employment was purely temporary; therefore I had no expectation that the employment would be made permanent.

4. The office of National Seating and Mobility, Inc., where I worked was managed by Mrs. Emily Williams and her husband, Don William was employed as a technician there.

5. During my short tenure with National Seating and Mobility, Inc., it became readily apparent that Don Williams had great influence at the office.

6. During the course of my employment with National Seating and Mobility, Inc., I came to know Felicia Barrow who was I learned employed with the Alabama Medicaid Agency.

7. I did not then nor do I now consider Ms. Barrow a friend.

8. During the course of my employment with National Seating and Mobility, Inc., NSM was interested only in profits not how its employees arrived at the profits.

9. I was not informed that my job performance at NSM was unsatisfactory to the extent that it could cause a problem with an agency that regulated NSM.

10. Retired special agent Michael Roeder apologized to me after I was acquitted on the charge of filing a false report with a law enforcement agency. He further informed me that defendant Shockley was upset with me because I did not meet with him for an interview.

11. I believed that the information I provided to the Alabama Medicaid Agency was true.

Further, Affiant saith not

Elizabeth Horton
Elizabeth Horton, Affiant

Sworn and subscribed to before me on this the 11th day of March, 2008.

Kathleen Shannon
Notary Public



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1 for Medicaid?

2 A. From 1999 until 2005.

3 Q. And what was your position there?

4 A. I held several positions. Do you want
5 all of those in . . .

6 Q. Yes, ma'am.

7 A. Okay. I was a Medicaid Administrator I
8 with the medical services division in
9 1999. In 2001, I became the associate
10 director in the long-term care
11 division. And in 2003, I moved to the
12 prior approval unit, which was within
13 the medical director's office, where I
14 was associate director.

15 Q. All right. And why did you leave the
16 Medicaid Agency?

17 A. Oh, I left because of a better job
18 opportunity.

19 Q. All right. More money?

20 A. Yes. Yes.

21 Q. And during your employment with the
22 Medicaid Agency, did you address any
23 concerns regarding infractions or

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1 vendor that we would come in contact
2 with on a, you know, continuous basis.

3 Q. If someone told an investigator that
4 you and Ms. Horton were friends, would
5 they be lying?

6 MR. WALKER: Object to the
7 form.

8 A. I would not consider us friends.
9 Acquaintances perhaps, simply because
10 of the nature of dealing with one
11 another on a daily basis.

12 Q. So you knew her in the professional
13 capacity?

14 A. Yes.

15 Q. Did you ever attend a concert with her?

16 A. No, I didn't. She had informed me that
17 there was a concert that was happening
18 in the city. And she did not attend
19 the concert; however, I did, with a
20 friend of mine.

21 Q. What was your understanding of Don
22 Williams' position with National
23 Seating & Mobility at that time?

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1 Chaseley prior to Elizabeth coming on
2 board, I believe.

3 Q. Did Chaseley make any complaints or
4 talk about any infractions --

5 A. Not to me.

6 MR. WALKER: Object to the
7 form.

8 Q. Have you ever been told that anybody
9 stated that Emily Williams advised one
10 of the physical therapists not to place
11 dates on prescriptions?

12 MR. STEWART: Object to the
13 form.

14 MR. WALKER: Object to the
15 form.

16 A. I believe that we did get a phone call
17 from a therapist. One of my staff
18 members, one of my nurse reviewers, had
19 received a phone call and we were
20 questioning the date. She questioned
21 the date being missing. And he
22 informed her that they were told not to
23 put dates on the forms.

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1 would look at the attachments to
2 Plaintiff's Exhibit #6.

3 (Brief pause while witness
4 reviews document)

5 A. Okay.

6 Q. Now, in your memo -- and I'll just
7 reference Plaintiff's Exhibit #6 --
8 your first statement in paragraph 1,
9 you say, Please find attached exhibits
10 of wheelchair assessments that have
11 been submitted by National Seating &
12 Mobility-Montgomery that were missing
13 the clinic dates. And I'm going to
14 show you once again the attachments to
15 Plaintiff's Exhibit #6, which is your
16 memo dated February 16, 2005. Now, is
17 this an example --

18 A. Yes.

19 Q. -- of clinic dates missing?

20 A. Yes.

21 Q. Is this a violation of the policy?

22 MR. STEWART: Object to
23 form.

1 A. That the vendor, National Seating &
2 Mobility, would be able to hold a
3 request for an unlimited period of time
4 and still submit it to the Medicaid
5 Agency without us being able to verify
6 the date in which the assessment was
7 actually done.

8 Q. And is this what you all consider as
9 fraudulent activity?

10 MR. STEWART: Object to the
11 form.

12 A. We consider --

13 MR. WALKER: Object to the
14 form.

15 A. I would say that it was inappropriate
16 in order for them to leave off dates.
17 It goes against policy.

18 Q. All right. Now, Plaintiff's
19 Exhibit #6, the memo states that two of
20 the assessments were conducted by Gerry
21 Rodgers, of physical therapy, and one
22 of Michael Maddox, RPT, both of
23 Children's Rehab Services. Okay?

1 Teresa Surles, a registered nurse,
2 questioned the assessments and was told
3 by Gerry Rodgers to get the dates from
4 Emily at National Seating. Now, is it
5 appropriate for Emily at National
6 Seating to give dates to place --

7 MR. STEWART: Object to
8 form.

9 Q. -- for clinic dates?

10 MR. WALKER: Object to the
11 form.

12 MR. STEWART: Object to
13 form.

14 A. As I understood it, Emily was the
15 person who would be working along with
16 the PT in clinic with the client. So
17 it would be appropriate for her to
18 provide a date.

19 Q. So this Children's Rehabilitation
20 Service report of visit, would Emily
21 provide a date for this visit?

22 A. Yes, it would be appropriate for her to
23 do so.

1 MR. STEWART: Object to the
2 form.

3 MR. WALKER: Object to the
4 form.

5 A. Yes, it is.

6 Q. Was this one of the complaints that
7 Elizabeth had against the company,
8 failure for them to place dates?

9 MR. STEWART: Object to the
10 form.

11 A. I do recall her mentioning that there
12 were dates missing from forms.

13 Q. Did she ever tell you that they wanted
14 her to fill in some of these dates?

15 MR. STEWART: Object to
16 form.

17 A. I don't recall if they were clinic
18 dates that they wanted her to fill in.

19 Q. But do you recall her saying they
20 wanted her to fill in any dates --

21 A. Yes.

22 Q. -- on any of the forms?

23 A. Yes.

1 dating the delivery tickets?

2 MR. WALKER: Object to the
3 form.

4 MR. STEWART: Object to the
5 form.

6 A. If a vendor does not put a date or have
7 the client date a delivery ticket, it
8 basically does not give the Medicaid
9 Agency any indication that the
10 equipment was delivered in the time
11 frame allowed by policy.

12 Q. And failure to deliver the equipment in
13 a timely manner, what would be the
14 adverse consequence?

15 MR. STEWART: Object to the
16 form.

17 A. It goes against policy. And that would
18 have been left up to the directors at
19 the agency as to what the consequence
20 would be.

21 Q. All right. Now, to continue reading in
22 the second paragraph for Plaintiff's
23 Exhibit #6, it says, Subsequent fax was

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1 MR. STEWART: Object to
2 form.

3 MR. WALKER: Object to the
4 form.

5 A. Yes, because it goes against policy.

6 Q. And is it misleading the --

7 MR. STEWART: Object to the
8 form.

9 MR. WALKER: Object to the
10 form. Sorry. Go ahead.

11 Q. Is it misleading the Medicaid Agency?

12 MR. WALKER: Object to the
13 form.

14 MR. STEWART: Object to the
15 form.

16 A. Yes.

17 Q. And, actually, is it fair to say that
18 it's fraud?

19 MR. WALKER: Object to the
20 form.

21 MR. STEWART: Object to the
22 form.

23 A. Yes.

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Felecia Barrow Deposition

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1 Q. Who told you that?

2 A. Mr. Rodgers.

3 Q. Now, this last sentence in paragraph --
4 in the third paragraph, Plaintiff's
5 Exhibit #6, you said, This was the same
6 information that was reported by former
7 National Seating employee, Elizabeth
8 Horton.

9 A. Yes.

10 Q. So Elizabeth Horton had reported the
11 same information that you witnessed
12 firsthand.

13 A. Yes.

14 Q. So based on what Ms. Horton had
15 reported and what you had reviewed, did
16 you request an investigation?

17 A. Yes, I did.

18 Q. Now, I'm going to show you what we'll
19 mark as Plaintiff's Exhibit #8.

20 (Plaintiff's Exhibit #8 was
21 marked for identification.)

22 MR. WALKER: I'm sorry,
23 Deborah. Which exhibit

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Felecia Barrow Deposition

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1 billing activities.

2 Q. And failure to put in dates, would that
3 be connected to the billings?

4 MR. STEWART: Object to the
5 form.

6 A. That would be connected to billing.

7 Q. All right. So if they manipulate
8 dates -- if National Seating &
9 Mobility, Don Williams, Emily Williams,
10 were manipulating dates on these clinic
11 dates and the delivery dates, that
12 affects billing --

13 A. Yes.

14 MR. STEWART: Object to the
15 form.

16 MR. WALKER: Object to the
17 form.

18 Q. -- and would amount to fraudulent
19 billing practices?

20 MR. WALKER: Object to the
21 form.

22 MR. STEWART: Object to the
23 form.

1 They was asking her questions on the
2 line as what information did she
3 receive regarding National Seating &
4 Mobility and -- regarding them not
5 having provided services or supplies to
6 Medicaid recipients regarding
7 wheelchairs. So all the exact details,
8 I don't remember. I don't recall.

9 Q. Do you remember Felecia saying anything
10 about she had documentation to support
11 the fact that they did have missing
12 dates on some of their documents?

13 A. I would have to say yes.

14 MR. STEWART: Object to
15 form.

16 A. Yes, ma'am.

17 Q. Do you remember her discussing
18 infractions at National Seating &
19 Mobility submitted to her department?

20 MR. STEWART: Object to
21 form.

22 A. I'm trying to understand the question.

23 Q. Such as missing dates on forms.

1 MR. STEWART: Same

2 objection.

3 A. Yes.

4 Q. What, if anything, did she say?

5 A. Again, I would have to say something on
6 the line where she would say they
7 received forms or documentation from
8 the company where certain dates were
9 not on the form for -- I guess missing
10 dates or . . .

11 Q. And was that part of Elizabeth Horton's
12 complaint as you understood it?

13 A. Yes, ma'am. I would say so, yes.

14 Q. And did Ms. Barrow say that she had
15 personal knowledge or just received
16 information in her office of the same?

17 A. Yes.

18 Q. Investigator Green did the
19 investigation at the office of National
20 Seating & Mobility here in Montgomery.
21 You reviewed his complaint where you
22 said he didn't find any criminal
23 activity.

1 corrections are made, then the
2 investigator has no other choice but to
3 conclude no criminal activity?

4 MR. WALKER: Objection to
5 form.

6 MR. STEWART: Object to
7 form.

8 A. Yes, ma'am.

9 Q. All right. Let me show you Plaintiff's
10 Exhibit #3, Bates Drab Page 14. If you
11 would, let us look at Paragraph No. 2.
12 Could you read that for the record,
13 please.

14 A. Teresa Surles, RN, questioned the
15 assessment and was told by Gerry
16 Rodgers to get the dates from Emily,
17 National Seating. I informed Teresa
18 that the clinic dates should be kept at
19 CRS where the assessment was conducted.
20 Teresa, under my direction, contacted
21 CRS to get the clinic dates instead of
22 Emily. Jackie, CRS, informed Teresa
23 that the date of the clinic appointment

1 was July 20th, 2004. The PA request
2 was submitted in February 2005. A
3 subsequent fax was received from Gerry
4 Rodgers indicating that the assessment
5 was reviewed on 2/15/05 and was still
6 okay. I conferred with Teresa and
7 Debbie and thought that we needed
8 updated clinic notes telling the
9 current condition of the clinic. On
10 another client, both the physician
11 notes and medical necessity and the PT
12 assessment were lacking dates.

13 Q. So when they failed to put dates on the
14 assessments, doesn't that alter the
15 system?

16 MR. STEWART: Object to the
17 form.

18 MR. WALKER: Object to the
19 form.

20 Q. Requirements.

21 A. Yes, ma'am.

22 Q. So that's actually where the fraud
23 occurred. Am I correct?

1 Q. So is it fair to say that this
2 assessment by Teresa Surles questioning
3 the assessments and missing dates,
4 would that pretty much be lining up
5 with the complaint that Elizabeth
6 Horton had?

7 MR. STEWART: Object to the
8 form.

9 A. Yes, ma'am.

10 MR. WALKER: Object to the
11 form.

12 Q. Was that a yes, Mr. Johnson?

13 MR. STEWART: Object to the
14 form.

15 A. Yes.

16 Q. All right. Now, if we can read the
17 next paragraph for the record.

18 A. Teresa came across another assessment
19 completed by M. Maddox and placed a
20 call to the PT to find out why the
21 dates was missing. The PT replied,
22 Maybe we're not supposed to do this,
23 pause, but I never put dates on the

1 assessment or the prescription because
2 it messes up the vendors, like we're on
3 a time clock. It is odd that the
4 assessments that Mr. Maddox has done
5 for other vendors have a date on them,
6 but the ones done for National Seating
7 do not have dates. This was the same
8 information that was reported by former
9 National Seating employee, Elizabeth
10 Horton.

11 Q. Now, looking at this document, you have
12 the same thing that Elizabeth Horton
13 complained of. You have a Medicaid
14 Agency employee that's firsthand
15 witness to it. Am I correct?

16 MR. STEWART: Object to
17 form.

18 MR. WALKER: Object to form.

19 A. That's correct.

20 Q. All right. Just based on this memo.

21 A. Yes.

22 Q. And this memo is written by whom?

23 A. Felecia Barrow.

1 MR. WALKER: Same.

2 A. No, ma'am.

3 Q. Does anybody know what he meant when he
4 said, according to Teresa, that I never
5 put dates on the assessment?

6 A. No, I don't know.

7 Q. Did anybody find out what he meant when
8 he said the prescriptions -- or the
9 prescriptions because it messes up the
10 vendor?

11 MR. WALKER: Object to the
12 form.

13 MR. STEWART: Same.

14 A. And the question is?

15 Q. Did anybody find out what he meant by
16 that?

17 MR. WALKER: Same.

18 MR. STEWART: Same
19 objection.

20 A. No, ma'am.

21 Q. Now, I'm just asking you as an
22 investigator. If you got National
23 Seating & Mobility know that they need

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1 dates, then you have a physical
2 therapist consistently submitting
3 assessments or prescriptions without
4 dates, then you have your Medicaid
5 employee, Felecia Barrow, receiving
6 information, how can any report that
7 Felecia Barrow gave be fraudulent?

8 MR. STEWART: Object to
9 form.

10 MR. WALKER: Object to form.

11 Q. I mean not Felecia but Elizabeth Horton
12 gave be fraudulent?

13 MR. STEWART: Same
14 objection.

15 MR. WALLACE: Objection to
16 form.

17 MR. WALKER: Object to the
18 form.

19 A. It can't be.

20 Q. So doesn't this suggest that there was
21 some kind of evidence or there was
22 something going on at National
23 Seating & Mobility?

1 by either party hereto provided for by
2 the Federal Rules of Civil Procedure.

3
4 * * * * *

5
6 ANTHONY L. GREEN

7 The witness, having first been duly
8 sworn or affirmed to speak the truth,
9 the whole truth, and nothing but the
10 truth, testified as follows:

11 THE REPORTER: Usual federal
12 stipulations?

13 MS. NICKSON: Yes.

14 MR. WALKER: Yes.

15 EXAMINATION

16 BY MS. NICKSON:

17 Q. Would you state your name for the
18 record.

19 A. I'm Special Investigator Anthony L.
20 Green.

21 Q. Mr. Green, I am Deborah Nickson. I am
22 a local attorney here in Montgomery and
23 I represent Elizabeth Horton, who is a

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1 MR. STEWART: Object to
2 form.

3 MR. WALKER: Same objection.

4 Q. You can answer.

5 A. Yes, I did.

6 Q. And first let me ask you, you said you
7 are a special investigator. And with
8 what division?

9 A. Alabama Medicaid Agency.

10 Q. How long have you been with the
11 Medicaid Agency?

12 A. Approximately two and a half years.

13 Q. Two and a half years?

14 A. Yes, ma'am.

15 Q. And what did you do prior to that?

16 A. Prior to that, I worked for the
17 Veterans Administration as a police
18 officer. I was lieutenant of
19 operations for Tuskegee University
20 Security Department. I worked with the
21 New York State Police for twenty-one
22 years, and I was in the military prior
23 to that.

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1 Q. Yes, sir. And the various prior
2 employers that you've listed, did you
3 have experience in investigating cases,
4 matters, events?

5 A. Yes, I did.

6 Q. And you said that your employment with
7 Medicaid has been two and a half years?

8 A. Yes, that's correct.

9 Q. And you are assigned as a special
10 investigator.

11 A. That's correct.

12 Q. And as a special investigator, what are
13 your duties and responsibilities?

14 A. We deal with cases involving Medicaid
15 fraud or suspected Medicaid fraud.

16 Q. And in your two and a half years with
17 Medicaid, how many cases have you
18 investigated, approximately?

19 A. I would think that a safe estimate
20 would be about seventy.

21 Q. About seventy?

22 A. Yes.

23 Q. And of the seventy cases, how many have

1 been confirmed on the allegations?

2 A. I'm going to say 50 percent.

3 Q. And for the 50 percent that you were
4 not able to confirm the allegations,
5 were any arrests recommended or made as
6 a result thereof?

7 A. I'm sorry. Repeat that.

8 Q. Okay. For the 50 percent where the
9 claims or -- the claims of a person
10 alleging fraudulent activity were not
11 substantiated, were arrests the result
12 of it?

13 A. No.

14 Q. In your two and a half years with
15 Medicaid, have you ever known of a
16 complainant to be arrested for the
17 complaint not being confirmed?

18 A. The only case that I'm aware of is the
19 one that I'm presently here for.

20 Q. And that is Elizabeth Horton?

21 A. Yes, ma'am.

22 Q. What, if anything, was different about
23 her complaint, if you know?

1 MR. STEWART: Object to
2 form.

3 A. From my perspective, it was, I would
4 say, a regular complaint. There was
5 nothing that I can think of that was
6 different from any of the other various
7 complaints we've received.

8 Q. Let's talk about how you got involved
9 in the case. How did you get involved
10 with the complaint that was allegedly
11 made by Elizabeth?

12 A. I received it in the same manner we
13 receive virtually all our cases. The
14 cases come in and my supervisor, Chief
15 Investigator Cliff Johnson, assigned
16 the case to me.

17 Q. Yes, sir. And did he give you a file?

18 A. Yes, he did.

19 Q. Do you remember what was contained in
20 the file?

21 A. There would have been a standard
22 complaint form, which would have
23 contained the basic allegation; the

1 Q. Does that mean that there's a prior
2 investigation?

3 A. Yes.

4 Q. Okay.

5 A. And from that point on, it's just
6 information that I came through during
7 the course of my investigation.

8 Q. All right. During the course of your
9 investigation, did you talk with a
10 young lady by the name of Chaseley
11 Weeks?

12 A. Yes, I did.

13 Q. What, if anything, did Ms. Weeks tell
14 you?

15 A. I spoke with Ms. Weeks, and basically
16 she informed me that she worked at
17 National Seating & Mobility; she's no
18 longer employed there. I'd just like
19 to refer back to see exactly what I
20 wrote.

21 Q. Yes, sir, you can.

22 A. Okay. I spoke with Ms. Weeks
23 initially, and she had agreed to meet

1 office had also conducted an
2 investigation on this. I requested a
3 copy of their report; and from there, I
4 went through to see who their
5 complainants and witnesses were, and I
6 attempted to contact individually the
7 same people. And -- and with finding
8 out that Elizabeth Horton was a
9 complainant in this case, that's pretty
10 much how I came in on her and that's
11 why she was contacted.

12 Q. And what, if anything, did Elizabeth
13 tell you?

14 A. I had several conversations with
15 Elizabeth -- should be Ms. Horton.
16 Over the course of our conversations,
17 she advised me that she felt that there
18 were some things going on with National
19 Seating & Mobility that she felt may
20 have been fraudulent.

21 Q. So her statements were pretty much one
22 and the same as Chaseley Weeks'?

23 A. Yes.

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1 form.

2 MR. WALKER: Object to the

3 form.

4 A. My opinion of Ms. Horton was that she
5 had information that she thought and
6 she suspected that something was going
7 on that wasn't correct or appropriate.
8 Do I think she was a liar? From my --
9 my time with her, no, I don't think she
10 was lying to me. But I will say that
11 one of the problems I did have with
12 Ms. Horton was after -- actually, she
13 was very, very, very, very difficult to
14 get in touch with, which made it very
15 difficult to follow up on some of the
16 information to keep the investigation
17 going. I believe that she believed
18 something was going on, but I don't
19 believe that she was as cooperative as
20 she could have been and possibly as she
21 should have been.

22 Q. Did she give the impression that she
23 didn't want to get involved?

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1 MR. STEWART: Object to the
2 form.

3 A. My gut feeling?

4 Q. Uh-huh.

5 MR. WALKER: Object to the
6 form.

7 Q. You have two complainants. You have
8 Chaseley Weeks, former employee, said
9 something is going on. Then you have
10 Elizabeth Horton, a former employee,
11 saying something was going on. What
12 was your gut feeling?

13 MR. STEWART: Object to the
14 form.

15 MR. WALKER: Same objection.

16 A. My only gut feeling was, is they
17 contacted with a complaint, as do many
18 other people. When I receive a
19 complaint, I assume that the people
20 that are calling believe that their
21 complaint is legitimate; and I look
22 into it from that basis until I prove
23 or disprove. So my gut feeling was, is

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1 that they believe that they had
2 something that they should notify us
3 about. I received the information; I
4 looked into it until I was satisfied
5 that there was nothing there.

6 Q. Okay. I'm going to show you this
7 document, and this will be Bates
8 Drab 14. Would you identify this
9 document for the record, please?

10 A. This is a document that was generated
11 by the Alabama Medicaid Agency
12 February 16th of 2005. This is a
13 memorandum from Dr. McIntyre, who's
14 medical director for the Medicaid
15 Agency.

16 Q. All right. If you would, just read
17 that first sentence for the record for
18 me, please.

19 A. Where it says --

20 MR. WALKER: It's from
21 Felecia Barrow, is who
22 it's to.

23 Q. Okay. The memorandum is to whom?

1 A. The memorandum is to -- I'm sorry. The
2 memorandum is to Dr. McIntyre and it's
3 from Ms. Barrow.

4 Q. And who is Dr. McIntyre?

5 A. Dr. McIntyre is the medical director at
6 Medicaid.

7 Q. And Felecia Barrow, who is she?

8 A. She's a former employee of Medicaid.
9 She was the associate director for the
10 prior approval unit.

11 Q. And she's writing this memorandum in
12 reference to?

13 A. Issues with wheelchair assessments
14 received.

15 Q. Now, in the first paragraph, what does
16 she state?

17 A. It's just saying that -- she's saying,
18 Please find an example of wheelchair
19 assessments that have been submitted by
20 National Seating & Mobility in
21 Montgomery that were missing client
22 dates.

23 Q. Clinic dates.

1 way that Elizabeth had a malicious
2 intent to harm National Seating &
3 Mobility, Don Williams, or Emily
4 Williams?

5 MR. WALKER: Object to the
6 form.

7 MR. STEWART: Object to the
8 form.

9 A. I don't know what her intent was. The
10 only thing I knew is that she had a
11 complaint and I just investigated the
12 complaint.

13 Q. But she was like a normal complainant?

14 MR. STEWART: Object to the
15 form.

16 MR. WALKER: Object to the
17 form.

18 A. Yes.

19 Q. Did she ever express maliciousness?

20 MR. STEWART: Object to the
21 form.

22 MR. WALKER: Object to the
23 form.

1 A. Not to me, no.

2 MS. NICKSON: All right. No
3 further questions.

4 EXAMINATION

5 BY MR. WALKER:

6 Q. Let me ask you a question, please, sir.
7 If you would look at Exhibit #1 and,
8 particularly, if you would look at
9 page 2 and if you would read the
10 paragraph, summary of fraudulent
11 activity.

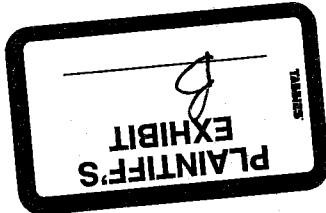
12 A. On June 1st, 2006, I met with Ms. Emily
13 Williams -- if I can skip the
14 abbreviations there -- with National
15 Seating & Mobility, 646 Oliver Road,
16 Montgomery, Alabama, and Tim Maddox of
17 National Seating & Mobility, 377
18 Riverside Drive, Suite 300, Franklin,
19 Tennessee, and reviewed -- and reviewed
20 the requested files. A review of these
21 files revealed no signs of any criminal
22 activity or wrongdoing. At no time did
23 this investigation reveal any signs of

JAN-31-2008 13:10 From:EDS PAYROLL

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Display Date Specifications
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Personnel No.	Name	Per Area	EDS Employees	Subarea	SE Abbrev	to	EE group	Leave of Absence	EE subgroup	Hr/Paid Pay/Bene	Withdraw
1119787	HORTON, ELIZABETH W					07/21/2005	12/21/0999	cong	06/19/2005	52R965	
Date Specifications											
Date Type											
BT Technical entry											
07/21/2005											
Date											
H2 Last day worked											
02/15/2005											
Date											
H2 Last Date Employed											
02/14/2005											
Date											

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